

EXHIBIT 15

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

JULIETA GARIBAY, *et al.*

vs.

DAVID WHITLEY, *et al.*

§
§
§
§
§

Civil Action No. 2:19-cv-00040

DECLARATION OF MARIA FELICITAS BARBOSA
IN SUPPORT OF APPLICATION FOR TEMPORARY RESTRAINING ORDER

STATE OF TEXAS
COUNTY OF AUSTIN

§
§

1. My name is Maria Felicitas Barbosa, and I am a resident and registered voter of Austin County. I am over the age of 18 and fully competent to make this declaration. I have personal knowledge of each of the matters stated in this declaration.
2. I naturalized and became a U.S. citizen on November 18, 2015.
3. I registered to vote the same day I became a U.S. citizen, on November 18, 2015, and I voted in the 2016 and 2018 General Elections.
4. I currently have a valid Texas driver's license. I most recently renewed my Texas driver's license at the Department of Public Safety ("DPS") on February 26, 2016. My driver's license expires on March 6, 2020.
5. When I went to renew my driver's license, I showed my naturalization certificate to prove my citizenship.
6. On January 31, 2019, my daughter opened the mail at my house and noticed that I had received a letter from the Austin County Voter Registrar. At the time I was in Mexico so

my daughter asked me if she could open the letter because she saw it was correspondence from the government and she was worried. I told her she could open the letter for me.

The letter, which was dated January 28, 2019, stated:

My office has received information concerning your registration to vote. Your registration status is being investigated because there is reason to believe you may not be a U.S. citizen. This information may have been provided by clerks of the court regarding individuals who were excused or disqualified from jury duty because they are not U.S. citizens and/or the Department of Public Safety ('DPS') for individuals possessing a Driver License or Personal Identification Card who DPS has identified are not citizens of the United States and/or other information derived through lawful means. You are now required to confirm your eligibility for registration by providing proof of citizenship to maintain your registration status. Proof of citizenship must be in a certified form of birth certificate, passport, or citizenship papers. If you fail to provide this proof of citizenship within 30 days from the date of this letter, your voter registration will be cancelled.

7. When my daughter read this letter, she immediately contacted me and told me I had 30 days to act or I would be removed from the voter rolls. I was very confused. I was not sure why I was being accused of not being a U.S. citizen, and I became really worried and angry.
8. On February 4, 2019, after I returned home, I asked my daughter to drive me to the Austin County Voter Registrar's office to present the requested proof of citizenship. In order for me to make this trip, I had to leave my husband's side while he was getting medical care at the medical clinic. In addition, I was very stressed out because my naturalization certificate was locked in a safe box that I could not open. Luckily, I was able to retrieve the certificate. My daughter had to take time off from work and leave her job to drive me to the Voter Registrar's office.

9. Once I arrived at the Voter Registrar's office, I presented the letter and my naturalization certificate. The clerk who spoke to me made a copy of my certificate and stated I did not need to take further action.
10. I felt and continue to feel very worried that I may no longer be allowed to vote. I am not sure if presenting my certificate of naturalization was sufficient, and I worry that my voter registration will be cancelled. I am also upset that I am on a list of individuals accused of illegal registration and voting. I worry that I'm going to be criminally investigated for registering and voting.
11. After living in this country for many years without the ability to vote, I was very proud and emotional to become a U.S. citizen and to finally register to vote. I cast my votes in previous elections very proudly.
12. If I am removed from the voter rolls for non-U.S. citizenship (when I am in fact a U.S. citizen), I do not know how I would be able to become a registered voter again.
13. I was lucky that my daughter checked the mail on time to see this letter. I worry that if other people receive a similar letter and do not check their mail promptly, they will not submit proof of citizenship on time and be removed from the voter rolls. I worry that they will not be able to exercise their right to vote, and I do not think it is fair.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct. Executed in Austin County, Texas on the 6 day of February, 2019.

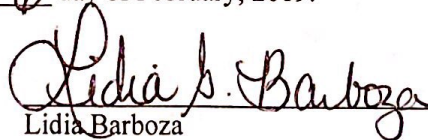


Maria Felicitas Barbosa

CERTIFICATE OF TRANSLATION

1. My name is Lidia Barboza and I speak English and Spanish.
2. I sight translated the foregoing declaration from English to Spanish by reading it to Maria Felicitas Barbosa in Spanish.
3. Maria Felicitas Barbosa affirmed that the contents of the declaration were true and correct to the best of her knowledge.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct. Executed in Austin County, Texas on the 6 day of February, 2019.



Lidia Barboza